



---DRAFT--Secondary Aluminum Sweat Furnace Workbook



Prepared for:

U.S. Environmental Protection Agency
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Durham, North Carolina

March 2003

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Table of Contents

| 1.0 | Introd | uction | l | | | | | | | |
|-----|--------|--|---|--|--|--|--|--|--|--|
| | 1.1 | What is the purpose of this document? | 1 | | | | | | | |
| | 1.2 | Who should use this document? | | | | | | | | |
| | 1.3 | How should I use this document? | 1 | | | | | | | |
| | 1.4 | How do I get copies of this document? | 1 | | | | | | | |
| | 1.5 | What is the purpose of the regulation? | 2 | | | | | | | |
| | 1.6 | Does this guidance replace the regulation? | | | | | | | | |
| | 1.7 | Whom may I contact if I have questions about the regulation? | 2 | | | | | | | |
| | 1.8 | How can I comply with the regulation? | 3 | | | | | | | |
| | 1.9 | How much will it cost me to comply? | 6 | | | | | | | |
| | 1.10 | What could happen if I don't comply? | 1 | | | | | | | |
| 2.0 | Applio | cability | 2 | | | | | | | |
| | 2.1 | Who does this regulation apply to? | 2 | | | | | | | |
| | 2.2 | Does this regulation apply to all existing, new and reconstructed sweat furnaces? | | | | | | | | |
| | 2.2 | 12 | | | | | | | | |
| | 2.3 | What does "reconstructed" mean? | 2 | | | | | | | |
| 3.0 | Expla | nation of Rule Requirements | | | | | | | | |
| | 3.1 | Compliance Requirements | 5 | | | | | | | |
| | | 3.1.1 When must I comply? | | | | | | | | |
| | | 3.1.2 What is an operating permit? | 5 | | | | | | | |
| | | 3.1.3 What is the emission limit for my sweat furnace? | 6 | | | | | | | |
| | | 3.1.4 What can I do to comply with the emission limit for my sweat furnace? | | | | | | | | |
| | | 2.1.5 Harrida I candrat a naufamana tatta damanatata initial canalismas? | 5 | | | | | | | |
| | | 3.1.5 How do I conduct a performance test to demonstrate initial compliance? | 0 | | | | | | | |
| | | 2.1.6. How must I require any sweet formers to demonstrate continuous considerate | 5 | | | | | | | |
| | | 3.1.6 How must I monitor my sweat furnace to demonstrate continuous compliance | ^ | | | | | | | |
| | 2.2 | (e.g., ensure that it does not emit too much)? | | | | | | | | |
| | 3.2 | Inspection Requirements | | | | | | | | |
| | 3.3 | Plan Requirements | | | | | | | | |
| | | 3.3.1 What is an OM&M plan? | | | | | | | | |
| | | 3.3.2 What is a startup, shutdown, and malfunction plan and how do I implement it 20 | | | | | | | | |
| | 2.4 | 3.3.3 What is a site-specific test plan? | | | | | | | | |
| | 3.4 | Notifications and Reporting Requirements | 1 | | | | | | | |
| | | 3.4.1 What reporting requirements are associated with the performance test? | 1 | | | | | | | |
| | | | 1 | | | | | | | |





| | | 3.4.2 What must I include in the notification of compliance status report? | 33 |
|--------|----------|--|--------|
| | | 3.4.3 What information on emissions must I report? | 35 |
| | | 3.4.4 What else must I report on a regular schedule? | 35 |
| | | 3.4.5 What must I report about startups, shutdowns, and malfunctions? | |
| | | 3.4.6 What must new or reconstructed sources report? | 37 |
| | 3.5 | Recordkeeping Requirements | |
| | 3.6 | Additional Requirements | |
| 4.0 | Checl | eklist | 41 |
| Apper | ndix A - | – Glossary of Terms | A-1 |
| Appei | ndix B - | – Sweat Furnace Brochure | B-1 |
| Apper | | – Example Reporting Forms | |
| | | al Notification Report | |
| | | fication of Intent to Conduct a Performance Test | |
| | | fication of Compliance Status Report | |
| | | ess Emissions/Summary Report | |
| | Annu | ual Compliance Certification | . C-19 |
| | " D | | |
| Apper | | - Sweat Furnace Requirements from the Secondary Aluminum Production Rule | ъ. |
| | • • • | | D- |
| | | List of Tables | |
| | | t of State Small Business Contacts | |
| | | mple Costs for Sweat Furnace/Afterburner Packages | |
| | | mple Costs for Afterburners | |
| | | andors of Sweat Furnaces and Afterburners | |
| Table | 5: Dele | legation of Authority for Secondary Aluminum NESHAP | 28 |
| | | List of Figures | |
| Figure | : Ph | notograph of Coreco Sweat Furnace and Afterburner (Models 1231 and 1848) | 9 |
| Figure | 2: Scl | chematic of Coreco Sweat Furnace and Afterburner (Models 1231 and 1848) | 9 |
| Figure | 3: Aft | fterburner | 10 |
| Figure | 4: Reg | egenerative Afterburner | 10 |
| Figure | 5: La | arge Sweat Furnace | 13 |





| Figure 6: | Small Sweat Furnace | | . 13 |
|-----------|---------------------|------|------|------|------|------|------|------|------|----------|
| Figure 7: | Small Sweat Furnace | | . 14 |
| Figure 8: | More Sweat Furnaces | | . 14 |





Checklists

| Checklist 1: | How to Design and Conduct Performance Tests | 19 |
|--------------|---|----|
| Checklist 2: | Actions to Take to Monitor the Operating Temperature of an Afterburner | 22 |
| Checklist 3: | Actions to Take When Conducting the Annual Inspection of an Afterburner | 23 |
| Checklist 4: | The Seven Basic Components of an OM&M Plan | 25 |
| Checklist 5: | Summary of Sweat Furnace Reporting Requirements | 32 |
| | What to Include in the Notification of Compliance Status Report | |
| | Summary of Sweat Furnace Recordkeeping Requirements | |





1.0 Introduction

1.1 What is the purpose of this document?

In this workbook, you will find a summary and explanation of the regulation (or rule) that the United States Environmental Protection Agency (EPA) published to reduce hazardous air pollutants (HAPs) released into the air by sweat furnaces (and other processes used to make secondary aluminum). This workbook describes the components of the regulation and advises you on what to do to satisfy the regulation.

A **sweat furnace** is a furnace that is used only to reclaim aluminum from scrap metal that contains aluminum and iron. Sweat furnaces reclaim aluminum by applying heat to the scrap to melt the aluminum but not so much heat that the iron melts.

1.2 Who should use this document?

We, the EPA, designed this document to help you, sweat furnace owners and operators, understand the rule for Secondary Aluminum Production as it applies to sweat furnace operations. This document was also designed to help your State, local, or Tribal permitting agency implement the rule. This workbook does not replace the final rule and we will not likely update its content to include any requirements added to the rule after the date of this workbook.

1.3 How should I use this document?

You should begin by reading sections 1, 2, and 3 of this document to learn what the Secondary Aluminum rule requires you to do. You can then use the checklist in section 4 to remind yourself of what you have to do to comply with the rule and to note whether you have met each requirement.

1.4 How do I get copies of this document?

You can get a copy of this document at EPA's Air Toxics Website (http://www.epa.gov/ttn/atw/). Look under Rules and Implementation for Secondary Aluminum Production: http://www.epa.gov/ttn/atw/alum2nd/alum2pg.html.





1.5 What is the purpose of the regulation?

Sweat furnaces release hazardous substances into the air when reclaiming aluminum. The most hazardous are dioxins and furans. Exposure to dioxins and furans increases the likelihood of developing cancer. The regulation protects people working or living near sweat furnaces by establishing an emission standard for dioxins and furans, thus reducing exposure by reducing emissions.

L Sweat furnaces release into the air dioxins and furans, which increase the likelihood of developing cancer.

1.6 Does this guidance replace the regulation?

No. When using this document, remember that it **does not** replace or change the final rule and covers only requirements published on or before **12/30/02**. You should read the rule itself carefully, and keep up with new requirements printed after this date by periodically checking the *Federal Register* and subpart RRR of part 63 of title 40, chapter I of the Code of Federal Regulations ("40 CFR Part 63"). You can get copies of Federal Register notices by going to the Government Printing Office (GPO) website at www.access.gpo.gov/su docs/aces/aces/40.html or to your local library.

You may find the published regulation ("National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production; Final Rule") in the March 23, 2000 issue of the *Federal Register*, pages 15710–15737. Changes to the rule were published on June 14, 2002 and December 30, 2002. The March 23, 2000 version of the regulation is available online at http://www.epa.gov/ttn/atw/alum2nd/fr23mr00.pdf. The most up-to-date version of the rule is available in subpart RRR of 40 CFR Part 63. We've included a summary list of all the rule requirements pertaining to sweat furnaces in Appendix D.

1.7 Whom may I contact if I have questions about the regulation?

There are a lot of places you can go for help, including your:

- ! State, local or Tribal air pollution control agency
- ! Local, regional, or national trade associations
- ! State's Small Business Assistance Program
- ! EPA Regional Offices

State, local, or Tribal Contacts can change frequently. To obtain the most current contact information go to the STAPPA/ALAPCO website (http://www.cleanairworld.org/scripts/stappa.asp)





and then to the membership directory. The directory will provide you with the current contact persons for your agency. Table 1 on pages 4-5 has a list of State Small Business Contacts as of February 2003. You will also want to identify your State, local, or Tribal permitting authority since you will submit reports to your permitting authority. Your State small business contact can help you identify your permitting authority.

Some of the *Trade Associations* representing the secondary aluminum production industry include the Automotive Recyclers Association (http://www.autorecyc.org/ or 703-385-1001) and the Institute of Scrap Recycling Industries (http://www.isri.org/ or 202-737-1770).

Many States have *Small Business*Assistance Programs (SBAP). If you are a small business and do not know who your SBAP representative is, you can call EPA's Control Technology Center Hotline at (919)541-0800 or visit EPA's SBAP at

http://www.epa.gov/ttn/sbap/ for help. Table 1 contains a list of State small business contacts.

The definition of "small business" depends on the industry code that applies to your company. Contact the Small Business Administration (www.sba.gov or 1-800-UASK-SBA) to determine whether you are a small business.

You may speak with a representative of the *EPA Regional Office* that is appropriate for you. You may determine which Regional Office to contact by viewing the following Web page: http://www.epa.gov/epahome/locate2.htm.

1.8 How can I comply with the regulation?

You can comply with the rule by:

- ! demonstrating that your sweat furnace emits no more pollution than it is allowed to emit by either
 - using a control device that meets the design requirements of the rule, or
 - < testing the emissions,
- ! monitoring to ensure that your sweat furnace continues to meet the requirements, and
- ! doing the necessary reporting and recordkeeping.

Section 3.0 will explain each of these steps in more detail. You will probably need to reduce the emissions from your sweat furnace in order to meet the requirements of the rule. You can reduce emissions from your sweat furnace by adding an air pollution control device to your sweat furnace, if you do not already have one. An afterburner is the most commonly used control device for sweat





furnaces (see pages 9-10 for images of afterburners). An afterburner is a device that uses controlled flame combustion to convert air pollutants to less harmful substances. Other names for an afterburner are thermal oxidizer and incinerator.



State Small Business Contacts



Table 1: List of State Small Business Contacts

| State | Contact | Telephone | Email |
|-------|---------------------|------------------|-----------------------------------|
| AK | Tom Turner | 907-269-7582 | tturner@envirvon.state.ak.us |
| AL | Blake Roper | 334-213-4308 | rbr@adem.state.al.us |
| AZ | Jack Bale | 602-207-2254 | bale.jack@ev.state.az.us |
| AR | Joe Bob Garner | 501-682-0866 | garner@adeq.state.ar.us |
| CA | Kathleen Tschogl | 916-327-5762 | ktschogl@arb.ca.gov |
| СО | Cathy Heald | 303-692-2034 | cathy.heald@state.co.us |
| СТ | Tracy Babbidge | 860-424-3382 | tracy.babbidge@po.state.ct.us |
| DE | Kim Finch | 302-739-6400 | kfinch@state.de.us |
| FL | William Davis | 850-921-9580 | william.davis@dep.state.fl.us |
| GA | Marvin Lowry | 404-362-2656 | marvin lowry@mail.dnr.state.ga.us |
| НІ | Patrick Felling | 808-586-4528 | pfelling@eha.health.state.hi.us |
| ID | Sally Tarowsky | 208-373-0472 | starowsk@deq.state.id.us |
| IL | Don Squires | 217-785-1625 | epa813@epa.state.il.us |
| IN | Erica Seydel Cheney | 317-232-8598 | eseydel@dem.state.in.us |
| IA | Dan Nickey | 319-273-2079 | |
| KS | Hamdy El-Rayes | 800-578-8898 | |
| KY | Rose Marie Wilmoth | 502-564-2150x128 | wilmoth@nrdep.nr.state.ky.us |
| LA | Jim Friloux | 225-765-0735 | jim f@deq.state.la.us |
| ME | Julie Churchill | 207-287-7881 | |
| MD | Don Jackson | 410-631-3165 | djakcson@mde.state.md.us |
| MA | Nancy Wrenn | 617-292-5587 | mwrenn@state.ma.us |
| MI | Dana Cole | 517-335-1847 | coled1@state.mi.us |
| MN | Charlie Kennedy | 651-297-8615 | charlie.kennedy@pca.state.mn.us |
| MS | Jesse Thompson | 601-961-5167 | jesse_thompson@deq.state.ms.us |
| МО | Byron Shaw | 800-361-4827 | nrshawb@mail.dnr.state.mo.us |



State Small Business Contacts



| State | Contact | Telephone | Email | | | | | |
|-------|--------------------------|-------------------|------------------------------------|--|--|--|--|--|
| MT | Bonnie Rouse | 406-444-3641 | brouse@state.mt.us | | | | | |
| NE | Melissa Woolf | 402-471-6624 | melissa.woolf@ndeq.state.ne.us | | | | | |
| NV | Marcia Manley | 702-687-4670x3162 | mmanley@ndep.carson-city.nv.us | | | | | |
| NH | Rudolph Cartier, Jr., PE | 603-271-1379 | rcartier@des.state.nh.us | | | | | |
| NJ | Ky Asral | 609-292-0112 | | | | | | |
| NM | Robert Horwitz | 505-827-2773 | bob_horwitz@nmenv.state.nm.us | | | | | |
| NY | Marian J. Mudar | 518-402-7462 | mudar@nysefc.org | | | | | |
| NC | Edythe McKinney | 919-733-0823 | edythe mckinney@p2pays.org | | | | | |
| ND | Jeff Burgess | 701-328-5150 | jburgess@state.nd.us | | | | | |
| ОН | Mark Shanahan | 614-728-3540 | mark.shanahan@aqda.state.oh.us | | | | | |
| OK | Steve Thompson | 405-702-7100 | steve.thompson@deqmail.state.ok.us | | | | | |
| OR | Paul Burnet | 503-229-5776 | burnet.paul@deq.state.or.us | | | | | |
| PA | Gene Delvecchio | 717-772-8951 | delvecchio.gene@dep.state.pa.us | | | | | |
| RI | Joe Antonio | 401-222-6822x4410 | jantonio@dem.state.ri.us | | | | | |
| SC | Phyllis T. Copeland | 800-819-9001 | copelapt@columb30.dhec.state.sc.us | | | | | |
| SD | Joe D. Nadenicek | 605-773-3151 | joeN@denr.state.sd.us | | | | | |
| TN | Ernest Blankenship | 615-741-5262 | eblankenship@mail.state.tn.us | | | | | |
| TX | Israel Anderson | 512-239-5319 | ianderson@tnrcc.state.tx.us | | | | | |
| UT | Renette Anderson | 801-536-4478 | randerso@deq.state.ut.us | | | | | |
| VT | Judy Mirro | 802-241-3745 | judym@dec.anr.state.vt.us | | | | | |
| VA | John Daniel | 804-698-4311 | jrdaniel@deq.state.va.us | | | | | |
| WA | Bernard Brady | 360-407-6803 | bbra461@ecy.wa.gov | | | | | |
| DC | Sandra Handon | 202-535-2255 | shandon@mail.environ.state.dc.us | | | | | |
| WV | Dave Bassage | 304-558-5929x203 | dbassage@mail.dep.state.wv.us | | | | | |
| WI | Pam Christenson | 608-267-9384 | pchristenson@commerce.state.wi.us | | | | | |
| WY | Dan Clark | 307-777-7388 | dclark@missc.state.wy.us | | | | | |



State Small Business Contacts







1.9 How much will it cost me to comply?

The cost varies greatly depending on whether you need to upgrade an existing afterburner, purchase a new afterburner, or purchase a new sweat furnace equipped with an afterburner. Depending on the age and efficiency of your existing sweat furnace, it could be more cost-effective in the long run to purchase a new sweat furnace equipped with an afterburner. If you purchase a new afterburner (or a new sweat furnace equipped with an afterburner), you should make sure that it comes with monitoring equipment and a data recorder, as well as a guarantee that it will comply with the Secondary Aluminum NESHAP. See Table 2 for sample costs for sweat furnace/afterburner packages and Table 3 for sample afterburner costs (all of these estimates are for units that would comply with the rule). Upgrading an existing afterburner that does not comply with the rule could cost several thousand dollars. See Table 4 for a list of contact information for vendors (note that this is not an complete list of all sweat furnace and afterburner vendors and that EPA does not endorse any particular vendor). See Figures 1 and 2 for a photograph and schematic of an example sweat furnace equipped with an afterburner. Figures 3 and 4 show examples of afterburners.

There are many types of sweat furnaces in use today, ranging from large, high-tech furnaces to small, portable, "home-made" furnaces. We recognize that it may be costly to bring some furnaces into compliance with the rule and that there is the possibility that some owners or operators will choose to discontinue the use of their sweat furnaces rather than install control equipment to comply with the rule.

Small, portable sweat furnaces are common in many industries. For example, scrap yards use sweat furnaces to reclaim aluminum from many forms of scrap (sheet and cast aluminum) and automotive salvage yards use them to reclaim aluminum from unusable auto parts (such as transmissions).



Costs of Sweat Furnaces & Afterburners



Table 2: Sample Costs for Sweat Furnace/Afterburner Packages

| Sweat Furnace Size (lb/hr) | Estimated Capital Cost for Sweat Furnace & Afterburner* | Vendor |
|-------------------------------|--|---------------------|
| 250 | \$20-25,000 | United Group |
| 500 | \$30,000 | United Group |
| 1,000 | \$128,000 | Stinchombe Furnaces |
| 2,000 | \$207,800 (Model 1231)** | Coreco |
| 2,500 | \$220,000 (Model AS990) | United Group |
| 5,000 | \$437,500 (Model 1848)** | Coreco |
| Small | \$37,000 | Stinchombe Furnaces |

^{*} These are estimates only; actual costs vary on a case-by-case basis. Unless otherwise noted, these estimates do not include installation costs but do include monitoring equipment.

Table 3: Sample Costs for Afterburners

| Sweat Furnace Size (lb/hr) | Estimated Capital Cost for Afterburner* | Vendor | | | |
|-------------------------------|--|---------------------|--|--|--|
| 200 | \$9,150 | Stinchombe Furnaces | | | |
| 300 | \$30,000 | Crown Andersen 2000 | | | |
| 500 - 5,000 | \$30,000 - \$275,000 | Crown Andersen 2000 | | | |
| 1,000 | \$27,362*** | Stinchombe Furnaces | | | |
| Any size | \$12 to \$25 per scfm** (regenerative afterburner) | HES | | | |

^{*} These are estimates only; actual costs vary on a case-by-case basis. Unless otherwise noted, these estimates do not include installation costs or the cost of monitoring equipment.

^{**} Does not include monitoring equipment.

^{**} The higher cost corresponds to a smaller unit; scfm = standard cubic feet per minute.

^{***} Includes monitoring equipment.



Costs of Sweat Furnaces & Afterburners



Table 4: Vendors of Sweat Furnaces and Afterburners*

| Vendors of Sweat Furnace/Afterburner Packages | Vendors of Afterburners |
|--|--|
| College Research Corp. (Coreco) | Crown Andersen 2000, Inc. |
| P.O. Box 577 | 306 Dividend Drive |
| Germantown, WI 53022 | Peachtree City, GA 30269 |
| Phone: (262)255-4700 | Phone: (770)486-2000, (800)241-5424 |
| Fax: (262)255-5283 | Fax: (770)487-5066 |
| Email: coreco@netwurx.net | Email: a2k@crownandersen.com |
| http://www.corecocorp.com | http://www.crownandersen.com |
| Stinchcombe Furnaces, Ltd. | |
| Unit 31A, Central Trading Estate, Cable Street, | Huntington Environmental Systems (HES) |
| Wolverhampton, WV2 2RS | 707C West Algonquin Road |
| United Kingdom | Arlington Heights, IL 60005 U.S.A. |
| Phone: 1 44 1902 870350 | Phone: (847)545-8800 |
| Fax: 1 44 1902 870880 | Fax: (847)545-1947 |
| Email: markham@tinyworld.co.uk | Email: info@huntington1.com |
| | Email: MACT111@aol.com |
| United Group, Inc. | http://www.huntington1.com |
| 408 NW 14 th Street | |
| Topeka, KS 66618 | |
| Phone: (800)999-0457 | |
| Fax: (785)232-4218 | |
| http://www.unitedgroupinc.com | |

 $[\]ensuremath{^{*}}$ EPA does not endorse these vendors or any other vendor.



Pictures of Sweat Furnaces & Afterburners





Figure 1: Photograph of Coreco Sweat Furnace and Afterburner (Models 1231 and 1848)

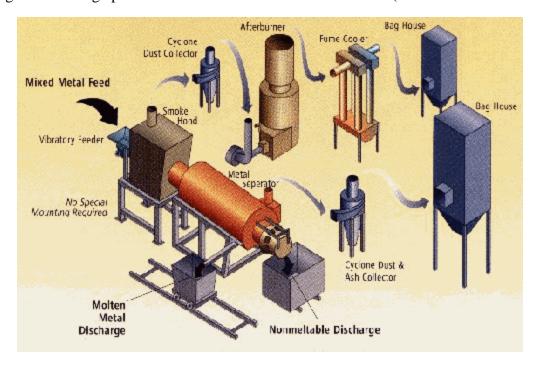


Figure 2: Schematic of Coreco Sweat Furnace and Afterburner (Models 1231 and 1848)



Pictures of Sweat Furnaces & Afterburners







Figure 3: Afterburner

Figure 4: Regenerative Afterburner





1.10 What could happen if I don't comply?

In addition to emitting hazardous pollutants like dioxin into the environment and potentially damaging the environment for not only your generation but many generations to come, if you fail to comply with the requirements of the rule, you could face legal action under the Clean Air Act. You may be assessed civil penalties of up to \$25,000 **per day** for non-compliance.

Does This Regulation Apply to Me?



2.0 Applicability

2.1 Who does this regulation apply to?

ALL secondary aluminum sweat furnaces. The regulation applies to you if you own or operate a sweat furnace and you are involved in the recovery of aluminum from scrap material—regardless of the size or location of the furnace or how often the furnace is operated.

A sweat furnace is a unit designed and used exclusively to reclaim aluminum from scrap that contains substantial quantities of iron by using heat to separate the low melting point aluminum from the scrap while the higher melting point iron remains in solid form. These units are also known as dry hearth furnaces. Figures 5 through 8 on the following pages show examples of sweat furnaces.

Due to their small size and portability, sweat furnaces are common in many industries. They are used to process scrap that cannot be processed in other furnaces. For example, scrap yards use sweat furnaces to reclaim aluminum from many forms of scrap (sheet and cast aluminum), and automotive salvage yards use them to reclaim aluminum from unusable auto parts (such as transmissions).

2.2 Does this regulation apply to all existing, new and reconstructed sweat furnaces?

Yes, the regulation applies to all existing sweat furnaces and all new or reconstructed sweat furnaces. A sweat furnace that was built after February 11, 1999 is considered a "new" sweat furnace. A sweat furnace that was reconstructed after February 11, 1999 is considered a "reconstructed" sweat furnace (see section 2.3 for a definition of reconstructed). See section 3.1.1 of this document for information on differences in regulations for existing and new/reconstructed sweat furnaces.

2.3 What does "reconstructed" mean?

Reconstructed or reconstruction has a specific meaning in the rule. For sweat furnaces, reconstruction means replacement of the components of a sweat furnace such that the fixed capital cost of the new components is greater than 50 percent of the fixed capital cost that would be required to construct a comparable new sweat furnace, and it is technologically and economically feasible for the reconstructed sweat furnace to meet the emission standard for dioxins and furnas. Replacement of the refractory in a sweat furnace is not considered to be reconstruction. A sweat furnace that was reconstructed after February 11, 1999 is considered a "reconstructed" sweat furnace.



Photos of Sweat Furnaces





Figure 5: Large Sweat Furnace





Figure 6: Small Sweat Furnace¹

 $^{^{\}rm 1}$ This furnace is likely to $\underline{\rm not}$ meet the requirements of the rule.



Photos of Sweat Furnaces





Figure 7: Small Sweat Furnace²





Figure 8: More Sweat Furnaces

 $^{^{\}rm 2}$ This furnace is likely to $\underline{\rm not}$ meet the requirements of the rule.





3.0 Explanation of Rule Requirements

This section includes explanations of the rule requirements. A checklist of these requirements is included in section 4.0 for your convenience.

3.1 Compliance Requirements

3.1.1 When must I comply?

- ! If your operation is an existing source (a sweat furnace that began construction or reconstruction on or before February 11, 1999), you must be in compliance with the rule by March 24, 2003.
- ! If you operate a new or reconstructed source (constructed or reconstructed after February 11, 1999), you must be in compliance with the rule by March 23, 2000, or upon startup, whichever is later.

3.1.2 What is an operating permit?

An operating permit is a legally enforceable document issued by a permitting authority to a source of air pollution (e.g., a facility operating a sweat furnace) that contains all of the air-related requirements that apply to the facility. These permits are commonly called "Title V" permits, because they are required by Title V of the Clean Air Act. They are also sometimes called "part 70" or "part 71" permits, because the specific requirements for permitting programs are included in parts 70 and 71 of chapter 40 of the CFR.

As an owner or operator of a sweat furnace, you will need to get an operating permit from your State, local, or Tribal permitting authority. Contact your State, local, or Tribal permitting authority to find out how to apply for an operating permit. Under the secondary aluminum regulation, the EPA has specified that the State, local, or Tribal permitting authority has discretion to allow sweat furnaces at

Regardless of whether you need/have an operating permit, you will need to be in compliance by the dates specified in section 3.1.1 and stay in compliance.

small facilities ("area sources") to defer getting an operating permit until December 9, 2004. Your facility is an area source if your facility has the potential to release into the air less than 10 tons per year of any individual hazardous air pollutant or 25 tons per year of any combination of hazardous air pollutants. You can find a list of hazardous air pollutants at http://www.epa.gov/ttn/atw/188polls.html. If your facility is an area source, check with your State, local, or Tribal permitting authority to find out





whether there is a deferral for your sweat furnace operation. If so, you must apply for a permit by December 9, 2005.

3.1.3 What is the emission limit for my sweat furnace?

If you want to convert measurements of dioxins and furans to TEQ units, you must use the procedures and equations in *Interim Procedures for Estimating Risks Associated with Exposures to Mixtures of Chlorinated Dibenzo-p-Dioxins and -Dibenzofurans (CDDs and CDFs) and 1989 Update*, EPA-625/3-3-89-016. The document is available from the National Technical Information Service (http://www.ntis.gov/). Order document number PB 90-145756.

A sweat furnace may not emit more than:

- ! 3.5 x 10⁻¹⁰ grains of dioxins and furans per dry standard cubic foot at 11 percent oxygen, or
- ! 0.80 nanogram of dioxins and furans toxicity equivalents (TEQ) per dry standard cubic meter at 11 percent oxygen.

Note that the unit of volume in the first form of the emission standard is a cubic <u>foot</u>, but the unit of

volume in the second form is a cubic <u>meter</u>. You can use either of these forms of the emission standard because they are equivalent.

3.1.4 What can I do to comply with the emission limit for my sweat furnace?

You have two options to select from in showing that your sweat furnace complies with the emission limit:

1. Conduct a performance test whose results show that the emissions from the process are less than the emission limitation listed in section 3.1.3. See section 3.1.5 for an explanation of how to conduct a performance test. If the test shows that the emissions from your sweat furnace are higher than the emission limitation, you will need to lower your emissions. In most cases, you will choose to use a control device to reduce

furnace emissions. An afterburner is the most commonly used control device for sweat furnaces. In some cases, you may choose instead to burn clean fuels or make other process modifications to meet the emission limitation.

L Tip: Wash materials before placing them into your sweat furnace in order to remove some of the chemicals that could be emitted into the atmosphere.





- 2. If you do not do a performance test, you need to:
 - ! Have an afterburner,
 - Have a residence time in the afterburner of 0.8 seconds³ or greater,
 - ! Monitor the temperature and maintain it at or above 1600°F, and
 - ! Record the temperature data and calculate 3-hour averages.

An afterburner is a device that uses controlled flame combustion to convert combustible materials to noncombustible gases. Other names for an afterburner are thermal oxidizer and incinerator.

By complying with these design requirements, you would not be required to conduct emissions testing to show compliance with the emission limit because the high temperature and residence time would ensure that you are meeting the regulation.

We expect that most of you will choose to comply with option #2. However, if you choose to conduct a performance test instead, you would likely need to hire a testing contractor to perform the test and prepare a report documenting the results of the test (your State, local, or Tribal air pollution control agency should have a list of contractors in your area). You may want to consider whether it would be more cost-effective in the long run to buy a new sweat furnace equipped with an afterburner that has a design residence time of 0.8 seconds or greater and an operating temperature of 1600°F or greater instead of conducting a performance test.

³ The final rule promulgated on 3/23/00 specified a design residence time of 2 seconds. However, this value was erroneous and had been corrected in the amendments published on 12/30/02 (67 FR 79808).





3.1.5 How do I conduct a performance test to demonstrate initial compliance?

Unless you are using an afterburner meeting the design requirements specified in the rule, you must conduct a performance test (or provide the results of a representative test as described below) in order to show that the average concentration of dioxins and furans (averaged over three cycles) is less than the emission limitation. You will also establish the operating limits that you will continue to monitor to ensure the ongoing performance of the control device. Performance tests must meet all the specifications in Checklist 1 on the following page of this workbook. Your State, local, or Tribal air pollution control agency should have a list of contractors in your area who you can hire to conduct performance tests.

You may not need to conduct a performance test if you have already conducted a performance test in which you measured the required parameters (e.g., emissions, temperature). You must obtain approval from the regulatory agency with jurisdiction over your sweat furnace to substitute a previous performance test (see section 1.7 for contact information). You must satisfy all the following conditions to obtain approval:

Checklist 1 on the following page of this workbook refers to the "operating cycle." In the context of sweat furnaces, operating cycle means the period including the charging and melting of scrap aluminum and the fluxing, refining, alloying, and tapping of molten aluminum (the period from tapto-tap).

- ! Provide a copy of the complete emission test report from the previous performance test.
- ! In the previous performance test, you used the test methods and procedures listed in Checklist 1 on the following page of this workbook.
- ! Certify that you have not changed the design or operating procedures of either the sweat furnace or add-on pollution control equipment since the previous test.
- ! In the previous performance test, you monitored the operating parameters according to the procedures in Checklist 2.
- ! The emission test report documents how you monitored the operating parameters.



Checklist for Performance Tests



Checklist 1: How to Design and Conduct Performance Tests

- G At least 60 days before conducting a performance test, prepare and submit a "site-specific test plan" (see section 3.3.3) to the EPA regional office and/or the State, local, or Tribal regulatory agency that issues operating permits to sources of air pollution. That plan must meet the specifications in 40 CFR §63.7(c). You may not conduct a performance test until the regulatory agency has approved your site-specific test plan.
- **G** Conduct every performance test according to the General Provisions in subpart A of 40 CFR Part 63.
- **G** Conduct the first performance test. New and reconstructed sources must conduct the test by March 23, 2000 or upon startup, whichever is later. Existing sources must conduct the test by March 24, 2003.
- **G** You must operate the sweat furnace at the highest production level and with materials that represent the range (or variety) of materials that you expect to process.
- **G** Conduct the test three times.
- **G** Sample dioxins and furans over the entire operating cycle.*
- **G** Measure emissions at the outlet of the control device.
- **G** Measure emissions according to Test Method 23 in appendix A of 40 CFR Part 60. You may use an alternative test method with the approval of the Administrator of the U.S. Environmental Protection Agency.
- **G** You must conduct a performance test every 5 years if your sweat furnace is in a secondary aluminum production facility that is a major source (see Appendix A for a definition of "major source").
- **G** Report the results of the first performance test and all the subsequent tests in a "notification of compliance status report" (see section 3.4.2).

^{*} Since a sweat furnace is a "batch process," the test should be conducted over one entire operating cycle; it does not need to be conducted for 3 hours as it would be for a continuous process.





3.1.6 How must I monitor my sweat furnace to demonstrate continuous compliance (e.g., ensure that it does not emit too much)?

If you conducted a performance test:

- You must continuously monitor the operating temperature of the afterburner to show that you maintain the 3-hour block average⁴ operating temperature of the afterburner at or above the average temperature established during your performance test. (Checklist 2 on the following page explains how to monitor the operating temperature of an afterburner.)
- ! You should submit data gathered during the performance test with your Notification of Compliance Status (see section 3.4.2).
- ! You need to keep records of the monitoring data, and an easy way to do this is with an automatic data recorder.⁵
- ! Your sweat furnace or afterburner may malfunction, causing the value of an operating parameter to deviate from the value or range established during the performance test. When the latter event happens, you must quickly repair the equipment and take steps to prevent another breakdown.

If you did not conduct a performance test:

You must continuously monitor the operating temperature of the afterburner to show that you maintain the 3-hour block average⁴ operating temperature of the afterburner at or above 1600°F (see Checklist 2).

⁴ If your furnace does not run for three hours at a time, contact your permitting authority for alternative monitoring options. One possible alternative could be to monitor the temperature in 1-hour blocks. See section 63.1510(w) in the regulation for more information.

⁵ You only need to operate the data recorder when the sweat furnace is running, not during periods when the sweat furnace is idle.





This requirement only applies to afterburners with a design residence time of 0.8 seconds⁶ or greater and an operating temperature of 1600°F or higher.

⁶ The final rule promulgated on 3/23/00 specified a design residence time of 2 seconds. However, this value was erroneous and had been corrected in the amendments published on 12/30/02 (67 FR 79808).





- " Residence time means the duration of time required for gases to pass through the combustion zone of the afterburner.
- Calculate residence time by dividing the volume (cubic feet) of the combustion zone of the afterburner by the volumetric flow rate of the gas stream in actual cubic feet per second (acfs).
 - For example, an afterburner with a volume of 30,000 cubic feet and a flow rate of 20,000 acfs would have a residence time of 1.5 seconds (e.g., $30,000 \text{ ft}^3 \div 20,000 \text{ acfs} = 1.5 \text{ seconds}$).
- If you need help calculating your residence time, contact your State small business representative.
- ! You need to keep records of the monitoring data, and an easy way to do this is with an automatic data recorder.⁵

<u>If you use a control device other than an afterburner</u> or have made other process changes to reduce emissions:

- Your operation, maintenance, and monitoring (OM&M) plan must reflect all of the necessary procedures and parameters you will use to ensure the continuous compliance of the sweat furnace with the emission limitation. See section 3.3.1 in this workbook and section 63.1510(b) of the rule for more information.
- ! Your monitoring equipment should have a data recorder⁵ so you can automatically keep records of your monitoring data.

You may apply to the Administrator of the U.S. Environmental Protection Agency for permission to use alternate monitoring requirements. Section 63.1510(w) in the regulation describes the process you would follow to submit an application.



Checklist for Monitoring Afterburner Temperature



Checklist 2: Actions to Take to Monitor the Operating Temperature of an

- 1. If you have an afterburner, you must install, calibrate, maintain, and operate a device to continuously monitor and record the operating temperature of the afterburner. You must satisfy the requirements for continuous monitoring systems in subpart A of 40 CFR Part 63.
- 2. You must make sure that the temperature monitoring device satisfies all of the following specifications:
 - **G** It is installed at the exit of the combustion zone of the afterburner.
 - **G** It records the temperature in 15-minute block averages and 3-hour block averages (for example, if 15-minute blocks last from 3:00 to 3:15, 3:15 to 3:30, etc., then a 3-hour block could last from 3:00 to 6:00). It must record the temperature at least once in each 15-minute interval.
 - G The response range of the data recorder must include the following values: (1) zero and (2) 1.5 times the "average temperature." The average temperature is either 1600°F (if you have an afterburner with a design residence time of 0.8 seconds or greater and an operating temperature of 1600°F or higher) or the temperature that you determine using the method described below is step #3.
- 3. If your afterburner does not have a design residence time of 0.8 seconds or greater and an operating temperature of 1600°F or higher, you must determine the "average temperature" that you will use to verify the operation of your data recorder using the following steps:
 - **G** Before the first test of the performance of your afterburner, evaluate the performance of the temperature monitor according to 40 CFR §63.8.
 - **G** When you conduct your performance test, you must conduct three test runs.
 - **G** Continuously measure and record the operating temperature for each run.
 - **G** Record the 15-minute block average temperature for each run.
 - **G** Record the 3-hour block average temperature for each run.
 - **G** Calculate the "average temperature" by adding the three 3-hour block average temperatures, and divide by three.



Checklist for Monitoring Afterburner Temperature



Afterburner



Checklist for Inspecting Afterburners



3.2 Inspection Requirements

You must inspect every afterburner at least once a year. Repairs must be made according to your OM&M plan. Follow Checklist 3, and record the results of your inspection.

Checklist 3: Actions to Take When Conducting the Annual Inspection of an Afterburner

- **G** Inspect all burners, pilot light assemblies, and pilot light sensing devices for proper operation.
- **G** Clean the pilot light sensors.
- **G** Inspect the combustion air for proper adjustment.
- **G** Inspect baffles and other internal structures to ensure their structural integrity.
- **G** Inspect dampers, fans, and blowers for proper operation.
- **G** Inspect sealing to make sure it is proper.
- **G** Inspect motors for proper operation.
- **G** Inspect the refractory lining of the combustion chamber. Clean and replace the refractory lining as necessary.
- **G** Inspect the shell of the afterburner for corrosion and hot spots.
- **G** For the burn cycle that follows the inspection, document the proper operation of the afterburner. Document adjustments to the afterburner.
- **G** Verify that the afterburner is in good operating condition.
- **G** Follow your operation, maintenance, and monitoring plan when making repairs.



Checklist for Inspecting Afterburners



LTip: Good operation

and maintenance of your equipment helps

3.3 Plan Requirements

3.3.1 What is an OM&M plan?

An operation, maintenance, and monitoring plan (OM&M Plan) describes the actions you will take to ensure proper operation of a sweat furnace and the device that controls emissions of dioxins and furans.

- ! You must prepare a written OM&M Plan and follow it.
- ! You must give the plan to the EPA regional office and/or the State, local, or Tribal regulatory agency that issues operating permits to sources of air pollution. The regulatory agency will review your plan and may require changes before approving your permit application.
- ! If needed, you may change the original plan; you will have to give the revised plan to the regulatory agency for their review.

; Warning: Never put into your sweat furnace any aluminum that may contain a liquid. An explosion could occur! Checklist 4 on the following page lists the seven basic components of an OM&M plan; section 63.1510(b) in the regulation has more specific information on the these components. The OM&M plan is one component of the application that you make for a part 70 or part 71 permit (see section 3.1.2 for more information).



Checklist for Your OM&M Plan



Checklist 4: The Seven Basic Components of an OM&M Plan

- **G** A list of the parameters of the sweat furnace and emission control device that you must set and monitor to ensure that the sweat furnace does not emit too much.
- **G** The schedule for monitoring the parameters in the list.
- **G** A description of the actions you will take to properly operate and maintain each sweat furnace and the afterburner or other emission control device.
- **G** A description of the actions you will take to properly operate and maintain the device that monitors the parameters in the list.
- **G** The actions you will take to monitor the parameters on your list.
- **G** The actions you will take to repair a sweat furnace or emission control device ("corrective actions") when the value of a parameter differs from its target value or range.



Plan Requirements



3.3.2 What is a startup, shutdown, and malfunction plan and how do I implement it?

You must prepare and implement a written plan that describes how you will start a sweat furnace and shut it down to minimize air pollution emissions, and what you will do to minimize air pollution emissions when the sweat furnace or air pollution control or monitoring equipment malfunctions. This is called a startup, shutdown, and malfunction (SSM) plan. The description of procedures must be specific. You must include the plan in the notification of compliance status report, which is described in section 3.4.1.

A more specific description of the contents of the plan appears in 40 CFR §63.6(e)(3), which explains the purpose of an SSM plan, what it should include, and how to keep SSM records. Your plan must include the following procedures:

- ! What you will do to determine the cause of malfunctions.
- ! How you will record the cause of malfunctions.
- ! How you will record the time the malfunction began and ended.
- ! What you will do to repair malfunctioning equipment.
- ! How you will record the actions you will have taken to repair malfunctioning equipment and minimize emissions during malfunctions.

You must follow the requirements in 40 CFR §63.10(b) for keeping records of startups, shutdowns, and malfunctions and the actions you take during these events. You must record and report actions that are inconsistent with the procedures in your plan for startups, shutdowns, and malfunctions.

LTip: Update your SSM plan as needed to ensure that you are prepared to handle all malfunctions.



Plan Requirements



3.3.3 What is a site-specific test plan?

Before conducting a performance test, you must prepare and submit a "site-specific test plan." That plan must meet the specifications in 40 CFR §63.7(c). You may not conduct a performance test until the regulatory agency has approved your site-specific test plan. You must submit the site-specific test plan at least 60 days before the first performance test.

If you choose to conduct a performance test, you likely would want to hire a testing contractor to perform the test. The contractor would also be able to prepare the site-specific test plan for you. Your State, local, or Tribal air pollution control agency should have a list of contractors in your area.

Submit the site-specific test plan to your regulatory agency. If your sweat furnace is in a State with an approved operating permit program but for which delegation of authority under section 112(l) of the Clean Air Act has neither been requested nor approved, you must submit the report to the Regional Administrator in the regional office of the U.S. Environmental Protection Agency for your State. Table 5 indicates for each State whether the State, local, or Tribal permitting authority has been delegated the authority to approve site-specific test plans. Contact your State, local, or Tribal permitting authority to confirm its delegation status, as information in Table 5 may have changed.

⁷ If your State, local, or Tribal permitting authority has not received delegation of the authority to approve site-specific test plans, the U.S. EPA regional office in your area will need to approve the plan. See Table 5 for a list of States



Plan Requirements



Table 5: Delegation of Authority for Secondary Aluminum NESHAP

| | | Major Sour | | | | |
|-------|--------------------|--|---------------------------|--|---------------------------|--|
| State | City/County | State, local, or Tribal permitting authority | EPA Regional Office | State, local, or Tribal permitting authority | EPA Regional Office | |
| AK | All | | X | | X | |
| | City of Huntsville | X | | X | | |
| AL | Jefferson Co. | X | | X | | |
| | Rest of State | | X | | X | |
| AR | All | | X | | X | |
| AZ | All | | X | | X | |
| CA | All | X | | | X | |
| CO | All | X | | X | | |
| СТ | All | | X | | X | |
| DC | All | | X | | X | |
| DE | All | | X | | X | |
| FL | All | X | | X | | |
| GA | All | X | | X | | |
| НІ | All | | X | | X | |
| IA | All | X | | X | | |
| ID | All | | X | | X | |
| IL | All | X | | X | | |
| IN | All | | X | | X | |
| KS | All | X | | X | | |
| 1737 | Jefferson Co. | | X | | X | |
| KY | Rest of State | X | | X | | |
| LA | All | | X | | X | |



Plan Requirements



| | | Major Sour | ces | Area Sourc | ees |
|-------|--|--|---------------------------|--|---------------------------|
| State | City/County | State, local, or Tribal permitting authority | EPA Regional Office | State, local, or Tribal permitting authority | EPA Regional Office |
| MA | All | | X | | X |
| MD | All | | X | | X |
| ME | All | X | | X | |
| MI | All | | X | | X |
| MN | All | | X | | X |
| МО | All | X | | X | |
| MS | All | X | | X | |
| МТ | All | X | | X | |
| NC | All | X | | X | |
| ND | All | X | | X | |
| NE | All | X | | X | |
| NH | All | X | | | X |
| NJ | All | X | | | X |
| NM | All | | X | | X |
| NV | All | | X | | X |
| NY | All | | X | | X |
| ОН | All | | X | | X |
| OK | All | | X | | X |
| OR | Lane Regional Air Pollution Authority | | X | | X |
| | Rest of State | X | | X | |
| D. | Allegheny Co. | X | | X | |
| PA | Rest of State | X | | | X |
| RI | All | X | | | X |



Plan Requirements



| | | Major Sour | ces | Area Sources | | |
|--|--------------------------|--|---------------------------|--|---------------------------|--|
| State | City/County | State, local, or Tribal permitting authority | EPA Regional Office | State, local, or Tribal permitting authority | EPA Regional Office | |
| SC | All | X | | X | | |
| SD | All | | X | | X | |
| The state of the s | Chattanooga-Hamilton Co. | | X | | X | |
| TN | Rest of State | X | | X | | |
| TX | All | | X | | X | |
| UT | All | X | | X | | |
| VA | All | X | | X | | |
| VT | All | X | | X | | |
| WA | All | | X | | X | |
| WI | All | | X | | X | |
| wv | All | X | | | X | |
| WY | All | X | | X | | |





3.4 Notifications and Reporting Requirements

Checklist 5 on the following page lists the notifications and reports you are required to submit.

F Contact your State, local, or Tribal permitting authority to find out to whom you should submit your reports and plans.

3.4.1 What reporting requirements are associated with the performance test?

You must notify your regulatory agency of your intent to conduct a performance test at least 60 days before the scheduled date of the test. You must also notify them of the scheduled date of the test.

LTip: Maintain a calendar or schedule of required notifications and reports in a visible place.

You must report the results of performance tests to your regulatory agency. Submit a complete report that documents test methods and procedures, operation of the sweat furnace and add-on pollution control equipment, and the operating parameters and their acceptable values. Submit the report with your notification of compliance status (within 60 days after the compliance date that applies to you).



Checklist of Your Reporting Requirements



Checklist 5: Summary of Sweat Furnace Reporting Requirements

| Report | Deadline for Existing Sources | Deadline for New Sources |
|--|--|--|
| G Initial notification | July 21, 2000 | July 21, 2000 or 120 days after startup, whichever is later |
| G Notification of anticipated date of performance test | 60 days before performance test | 60 days before performance test |
| G Site-specific test plan | 60 days before performance test | 60 days before performance test |
| G OM&M plan | March 24, 2003 | 90 after performance test or 90 days after startup if not conducting a performance test |
| G Notification of compliance status report | May 23, 2003 | 90 after performance test or 90 days after startup if not conducting a performance test |
| G Excess emissions/summary reports | Semi-annually, 60 days after calendar half (e.g., 3/1 & 8/30) | Semi-annually, 60 days after calendar half (e.g., 3/1 & 8/30) |
| G Annual compliance certifications | With one of the semi-annual reports | With one of the semi-annual reports |
| G SSM reports | 30 days after calendar half when a SSM occurred (e.g., 1/30 & 7/30) | 30 days after calendar half when a SSM occurred (e.g., 1/30 & 7/30) |
| G Report of actions inconsistent with SSM plan | 2 working days after event (phone report) and 7 working days after event (letter report) | 2 working days after event (phone report) and 7 working days after event (letter report) |





What must I include in the notification of compliance status report?

You must submit a complete "notification of compliance status report" within 60 days of the compliance date that applies to you. Checklist 6 lists the items that you must report. If you do not need to conduct a performance test, then some of the items in Checklist 6 do not apply to you.

An official of your company must sign the report and certify its accuracy.

You may submit the report in several ways:

- į in an application for an operating permit,
- į in an amendment to an application for an operating permit, or
- as a separate document.

You may also submit the report in parts; you do not need to duplicate previously-submitted parts. However, if you do submit the report in parts, you should indicate in the report that you are doing so. You must submit all the parts within 60 days of the compliance date that applies to you.

Submit the report to your regulatory agency. In addition, if your sweat furnace is in a State with an approved operating permit program but for which delegation of authority under section 112(l) of the Clean Air Act has neither been requested nor approved, you must also submit the report to the Regional Administrator in the regional office of the U.S. Environmental Protection Agency for your State. Table 5 (starting on page 28) indicates for each State whether the State, local, or Tribal permitting authority has received delegation of authority. Contact your State, local, or Tribal permitting authority to confirm its delegation status, as information in Table 5 may have changed.



Checklist for Your Notification of Compliance Status



Checklist 6: What to Include in the Notification of Compliance Status Report

- **G** A complete performance test report for each sweat furnace that contains the following information:
 - **G** All the data from the test.
 - **G** All measurements from the test.
 - **G** All calculations from the test.
- **G** Approved site-specific test plan.
- **G** Performance evaluation test results for each continuous monitoring system.
- **G** Acceptable value or range of values for the parameters of the afterburner or other add-on control device that you will monitor to ensure that the sweat furnace does not emit too much.
- **G** Supporting documentation for the acceptable parameter values.
- **G** Description of the procedure used to establish the acceptable parameter values. Include the operating cycle or time period used in the performance test.
- **G** Information that shows that your capture/collection system satisfies the requirements of the regulation.
- **G** If you operate an afterburner to control emissions from a sweat furnace and you do not need to conduct a performance test, information that documents the design residence time and design operating temperature of the afterburner. The afterburner manufacturer's specifications may be sufficient.
- **G** Operation, maintenance, and monitoring plan.
- **G** Startup, shutdown, and malfunction plan.





3.4.3 What information on emissions must I report?

You must submit an "excess emissions/summary report" to your regulatory agency every 6 months. The report is due 60 days after the end of each 6-month period.

You must submit a report even if your sweat furnace and add-on pollution control equipment operated properly (within the normal parameters). State in the report that excess emissions were not made during the report period. You must also provide the information specified in 40 CFR §63.10(c).

You must provide additional information in the excess emissions/summary report if a sweat furnace or add-on pollution control equipment did not operate properly. The required information depends on the following circumstances:

- ! If the afterburner temperature or the actual value of any other significant parameter went outside the range required for compliance with the emission standard.
- ! If an action taken during startup, shutdown, or a malfunction was inconsistent with your startup, shutdown, and malfunction plan.

3.4.4 What else must I report on a regular schedule?

Every year, you must certify continuing compliance with the regulation. You complied if your sweat furnace and add-on pollution control equipment operated properly (within the normal parameters), and you met all the monitoring, recordkeeping, and reporting requirements.

3.4.5 What must I report about startups, shutdowns, and malfunctions?

When actions that you take during startups, shutdowns, and malfunctions <u>are consistent</u> with the procedures in your SSM plan, you must keep records demonstrating that you followed the procedures in your SSM plan (for example, this may take the form a checklist). On a semi-annual basis, you must submit a report confirming that you took actions consistent with your plan during startups, shutdowns, and malfunctions that occurred during the semi-annual reporting period. These reports are due 30 days after the end of the calendar half (e.g., due 7/30 for the calendar half covering 1/1 through 6/30).





If you take actions during a startup, shutdown, or malfunction that <u>are not consistent</u> with your SSM plan, you must:

- ! record the actions that you took during the event,
- ! report the event to your regulatory agency (e.g., by telephone) within 2 working days of commencing the actions inconsistent with your plan, and
- ! submit a letter within 7 working days after the end of the event reporting that you took actions inconsistent with your plan.





3.4.6 What must new or reconstructed sources report?

If you build a new furnace or reconstruct a furnace at a <u>major source</u> of hazardous air pollutants, you must apply for approval to construct or reconstruct. If you build a new or reconstructed furnace that is <u>not at a major source</u> of hazardous air pollutants, you must submit a notification (see sections 2.2 and 2.3 for an explanation of new and reconstructed). Check with your State, local, or Tribal permitting authority to find out if you need a construction permit prior to construction or reconstruction.

You must submit the notification or application as soon as you can before construction is planned. The notification or application must include all the information required by 40 CFR §63.5(b). Specifically your notification or application must include:

- ! Your name and address
- ! A notification of intent to construct a new source
- ! The address of the source
- ! Identify that you are subject to the Secondary Aluminum NESHAP
- ! When you expect to start construction
- ! When you expect to finish construction
- ! When you expect to start your sweat furnace
- ! The hazardous air pollutants that you will emit and how much
- ! Other information including the air pollution equipment you will operate and the control efficiency of the equipment



Recordkeeping Requirements



3.5 Recordkeeping Requirements

You must maintain files that contain all the reports and notifications that are required by this regulation. You must keep records for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, or record. The records from the most recent 2 years must be on the premises of the facility at which the sweat furnace is located. You may use microfilm, computer disks, magnetic tape, or microfiche to store records. You may submit information on paper or on a labeled computer disk. If you use the latter, you must create the electronic documents in formats that allow EPA's staff, or the staff of your State, local, or Tribal air pollution control agency, to open them with software they use (e.g., Word Perfect, Microsoft Word).

If you control emissions of dioxins and furans with an afterburner, you must keep additional records.

- ! Records of 15-minute block average operating temperature of the afterburner.
- ! Records of any period when the average temperature in any 3-hour block period falls below the value necessary to prevent excess emissions.
- ! Explanations, which may be brief, of the cause of temperatures that are too low.
- ! Descriptions of the actions taken to repair the afterburner.
- ! Records of annual inspections of afterburners.

You must keep the records specified in 40 CFR §63.10(c) if you operate a continuous monitoring system. These records include: all required monitoring measurements, information about malfunctions, the data and time of periods during which the monitoring system was inoperative or out-of-control, and other records.

You must keep records of the annual inspections of emission capture/collection and closed vent systems, and records for any approved alternative monitoring procedure or test method. Additionally, you must have at hand the current startup, shutdown, and malfunction plan. You must also have the records that document how you followed the plan. Checklist 7 on the following page lists the records you must keep.



Checklist of Your Recordkeeping Requirements



Checklist 7: Summary of Sweat Furnace Recordkeeping Requirements

- **G** For afterburner: records of 15-minute average operating temperature, including any period when average temperature in any 3-hr block period falls below compliant operating parameter value with a brief explanation of cause and corrective action taken; records of annual inspection
- **G** For capture/collection systems: records of annual inspection
- **G** Copies of all notifications and reports and their supporting documentation
- **G** Records of occurrence and duration of each SSM or malfunction of operation of process, control, and monitoring equipment
- **G** Records of actions inconsistent with your SSM plan and actions consistent with your SSM plan
- **G** Records of measurements needed to demonstrate compliance
- **G** Records of performance test results
- **G** Records of any approved alternative monitoring or test procedure
- **G** SSM plan
- **G** OM&M plan



Additional Requirements



3.6 Additional Requirements

Appendix A in the Secondary Aluminum regulation lists all the elements in the "General Provisions" which also apply to secondary aluminum producers. You must meet these requirements as indicated in Appendix A of the rule. In addition, the rule contains many other requirements which apply to other types of equipment at secondary aluminum production facilities. If you operate any of these other types of equipment (e.g., scrap shredders, chip dryers, other types of furnaces), you should read the applicable parts of the rule.

There may also be water or solid waste regulations for your facility, in addition to the air regulations summarized above. Check with your State, local, or tribal permitting authority to find out whether there are other regulations that apply to you.





4.0 Checklist

This checklist is provided for your convenience. If you are able to complete all of the items on this checklist satisfactorily, then you are likely to be in compliance with the Secondary Aluminum rule. This checklist uses "we" to denote what you and your facility do; it uses stars and "you" to give important instructions to you and your facility about each item in the checklist. While the requirements are listed in an order in which you might want to complete them, it is not necessary to complete them in the order in which they are listed in this checklist.

Air Ouality Requirements⁸

- 9 9 A-1 We submitted an *initial notification* within 120 days after the effective date of the regulation (March 23, 2000) or 120 days after starting up our facility.
 - **Q** Section 3.4 contains more information on the notifications you must submit.
- Yes No N/A A-2 999 We submitted a notification of intent to conduct a performance test at least 60 days before we were scheduled to conduct a performance test.
 - You must conduct the test by your compliance date (3/24/03 for existing sources and 3/23/00 or upon startup for new and reconstructed sources).
 - **Q** This requirements does not apply to you if your sweat furnace is equipped with an afterburner that has a design residence time of 0.8 seconds³ or greater and an operating temperature of 1600°F or greater. You should check the "N/A" box.

A-3 999 We submitted a site-specific test plan at least 60 days before we were scheduled to conduct a performance test.

⁸ There may also be water quality and solid waste requirements that apply to your facility. Check with your State, local, or Tribal permitting authority.





- This requirements does not apply to you if your sweat furnace is equipped with an afterburner that has a design residence time of 0.8 seconds³ or greater and an operating temperature of 1600°F or greater. You should check the "N/A" box.
- See section 3.3.3 for more information on what to include in your test plan.
- A-4 **Yes** No **9 9**

We operate an afterburner with a design residence time of 0.8 seconds or greater and an operating temperature of 1600°F or greater.

OR

Yes No

- We conducted a test to show that the emissions of dioxins and furans are at or below 3.5 x 10⁻¹⁰ grains of dioxins and furans per dry standard cubic foot at 11 percent oxygen (or 0.80 nanogram of dioxins and furans toxicity equivalents [TEQ] per dry standard cubic meter at 11 percent oxygen).
 - You have two options for complying with this standard, see section 3.1.4 of this document for details.
- Yes No
- A-5 **9 9** We have prepared, submitted, and are following our *OM&M plan*.
 - You must submit your OM&M plan to the EPA regional office and/or the State, local, or Tribal regulatory agency that issues operating permits to sources of air pollution.
 - **Q** For more information on what to include in an OM&M plan, see section 3.3.1 of this document.





A-6 **9 9**

We have prepared and are following our *Startup*, *Shutdown*, & *Malfunction* (SSM) plan.

- You must submit your SSM plan as part of your notification of compliance status report (see requirement A-7).
- See section 3.3.2 for more information on what to include in your SSM plan.

Yes No

9 9

A-7

We submitted a complete *notification of compliance status report* within 60 days after our compliance date.

- An official from your company must sign the report and certify its accuracy.
- The following items must be included with your notification of compliance status report. See section 3.4.2 and Checklist 6 for a full description of items to include in your report.
 - ! A complete performance test report, if required
 - ! Your approved site-specific test plan, if required
 - ! Your approved OM&M plan
 - ! Your current SSM plan
- You may submit your report in parts (e.g., the items do not all have to be submitted at the same time).

Yes No

9 9

A-8

We demonstrate continuous compliance with the emission standard. Check **ONE** of the following:

G If we conducted a performance test to demonstrate initial compliance: we monitor the 3-hour block average operating temperature of the afterburner to ensure that it is at or above the temperature we established during the performance test.





- **G** If we have an afterburner with a design residence time of 0.8 seconds⁹ or greater and an operating temperature of 1600°F or greater: we monitor the 3-hour block average operating temperature to ensure that it is at or above 1600°F.
- **G** If we use a control device other than an afterburner: we demonstrate continuous compliance according to the procedures we included in our operation, maintenance, and monitoring (OM&M) plan.
- See section 3.1.6 and Checklist 2 for more information on continuous compliance.
- A-9 **9 9** We inspect every afterburner at least once a year, and make repairs according to our operation, maintenance, and monitoring (OM&M) plan (see requirement A-4).
 - **Q** See section 3.3 for an inspection checklist.
- A-10 **9 9** We submit an *excess emissions/summary report* every 6 months, within 60 days of the end of each 6-month period (e.g., submit by 8/30 for 1/1 6/30 period).
 - **Q** Section 3.4.3 provides an explanation of this report.
- A-11 **9 9** We submit *semi-annual SSM reports* to report startup, shutdown, and malfunction events for which we took actions that were consistent with our SSM plan.
 - **Q** These reports are due 30 days after the end of each calendar half.
 - **q** More information about SSM-related reports can be found in section 3.4.

Yes No

Yes No

⁹ The final rule promulgated on 3/23/00 specified a design residence time of 2 seconds. However, this value was erroneous and had been corrected in the amendments published on 12/30/02 (67 FR 79808).





- A-12 **9 9** We submit *immediate SSM reports* to report startup, shutdown, and malfunction events for which we took actions that were inconsistent with our SSM plan.
 - An initial report must be made within two working days of the event, and a letter report must be submitted within 7 working days of the event.
 - **Q** More information about SSM-related reports can be found in section 3.4.
- A-13 **9 9** We maintain copies of all of the records we are required to keep.
 - **Q** These records must be kept for at least 5 years, and the most recent 2 years of records must be kept on-site. Records must be accessible within 24 hours of a request to see them.
 - **Q** Records may be kept in hard copy, or you may use microfilm, computer disks, magnetic tape, etc. to store them.
 - **Q** See section 3.5 and Checklist 7 for a checklist of all of the records you must keep.



Appendix A



Appendix A – Glossary of Terms

Common Definitions for Some Terms Used in this Document

Afterburner

A device that uses controlled flame combustion to convert combustible materials to noncombustible gases. Other names for an afterburner are thermal oxidizer and incinerator.

Ambient Air

Any unconfined portion of the atmosphere: open air, surrounding air.

Capture/Collection Systems

Equipment that is used to capture and collect air pollution (e.g., particulate matter).

Control Device

Equipment, other than inherent process equipment, that is used to destroy or remove air pollutant(s) prior to discharge to the atmosphere (e.g., afterburner).

Dioxins and Furans (D/F)

Tetra-, penta-, hexa-, and octachlorinated dibenzo dioxins and furans.

Emission

Any discharge or release of an air contaminant to the ambient air.

Excess Emissions

Any emissions greater than those permitted by the sweat furnace emission limitation.

HAP

Any hazardous air pollutant listed in or pursuant to section 112(b) of the Clean Air Act.

Major Source

An stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants.

Operating Cycle



Appendix A



The period including the charging and melting of scrap aluminum and the fluxing, refining, alloying, and tapping of molten aluminum (the period from tap-to-tap).

Operating Parameter

A variable, measurable property that indicates the performance/operation of a system (e.g., temperature, pressure, flow rate).

Residence Time

For an afterburner, the duration of time required for gases to pass through the afterburner combustion zone.

Sweat Furnace

A furnace used exclusively to reclaim aluminum from scrap materials that contain substantial quantities or iron by using heat to separate the low-melting point aluminum from the scrap while the higher melting point iron remains in solid form.

TEQ

The international method of expressing toxicity equivalents for dioxins and furans as defined in "Interim Procedures for Estimating Risks Associated with Exposures to Mixtures of Chlorinated Dibenzo-p-Dioxins and -Dibenzofurans (CDDs and CDFs) and 1989 Update" (EPA-625/3-89-016).



Appendix B



Appendix B – Sweat Furnace Brochure

A brochure entitled "New Regulation Controlling Emissions from Secondary Aluminum Production (Sweat Furnace Operations)" can be found at http://www.epa.gov/ttn/atw/alum2nd/secalum.pdf.





Appendix C – Example Reporting Forms

On the following pages are examples of the reports that you need to submit to comply with the Secondary Aluminum NESHAP. These examples are designed for any source complying with the rule, not just sweat furnace owner/operators, so parts of the reports may not be applicable to you.





Initial Notification Report

This is a **sample** notification form that you can use to comply with 40 CFR 63.1515(a). See http://www.epa.gov/ttn/atw/alum2nd/alum2pg.html for more information about the rule. You should complete separate forms for each plant at which secondary aluminum production occurs.

Applicable Rule: 40 CFR Part 63 Subpart RRR - National Emission Standards for Hazardous Air

Pollutants for Secondary Aluminum Production. Initial notification is being made in accordance with §63.1515(a) [this serves as the identification of the relevant

standard, as required by §63.9(b)(2)(iii)].

I. GENERAL INFORMATION

| Print or type the following information for each plant that produces secondary aluminum |
|---|
| (§63.9(b)(2)(i)-(ii)): |
| Owner/Operator |
| Street Address |
| Mailing Address |
| Website (optional) |
| Plant Name |
| Plant Contact/Title |
| Plant Contact Phone Number (optional) |
| Plant Street Address |
| Plant Mailing Address |
| Plant Fax Number (optional) |
| Plant Email Address (optional) |
| Plant 4-digit Standard Industrial Classification (SIC) Code(s) (optional; for help see |
| http://www.osha.gov/ oshstats/sicser.html) |
| Plant UTM coordinates (optional; for help see http://terraserver.homeadvisor.msn.com/) |
| |
| Plant Permit Number (optional) |



III.

1.

2.

3.

Appendix C



| II. | CERTIFICATION | (Note: You may | y edit the text in th | nis section as d | leemea | l appropriate) |
|-----|---------------|----------------|-----------------------|------------------|--------|----------------|
|-----|---------------|----------------|-----------------------|------------------|--------|----------------|

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify that the information contained in this notification is accurate and true to the best of my knowledge. Name of Responsible Official: Title of Responsible Official: Signature Date SOURCE DESCRIPTION **Check** your existing/new source status (optional): Existing source [affected source(s) constructed on or before February 11, 1999; must comply with Secondary Aluminum NESHAP by March 24, 2003] G New source [affected source(s) constructed or reconstructed after February 11, 1999; must comply with Secondary Aluminum NESHAP by March 23, 2000 or upon initial startup, whichever is later] G New source at an aluminum die casting facility, aluminum foundry, or aluminum extrusion facility [must comply with Secondary Aluminum NESHAP by March 24, 2003 or upon initial startup, whichever is later]

- 4. **Check** your major/area source status (§63.9(b)(2)(v)):
 - G Major Source [potential plant-wide hazardous air pollutant (HAP) emissions exceed 10 tons/year for a single HAP or 25 tons/year for a combination of HAP's]
 - G Area Source [potential plant-wide HAP emissions total less than 10 tons/year for a single HAP or 25 tons/year for all HAP's]

Indicate your anticipated compliance date (§63.9(b)(2)(iii)):

operating design capacity (§63.9(b)(2)(iv)):_____

Briefly describe the nature, size, design, and method of operation of your plant, including the





Check the emission estimation method used to determine major/area source status (optional):

- **G** Previous source test data
- **G** Manufacturer's test data
- **G** Industry emission factors
- **G** Other method (specify)_
- 5. **Indicate** the number of each type of affected source/emission unit that exists at your plant and the hazardous air pollutants (HAP) emitted¹ from each point (§63.9(b)(2)(iv); see definitions in §63.1503):²

| Number | Affected Source | HAP Emitted | | | | | |
|--------|--|-------------|------------|------------|----------------------------|-------------|--------------|
| | Sweat furnace | QSb QHF | QAs QPb | QCd QMn | Q Cr Q Hg | QD/F QNi | QHCl |
| | Aluminum scrap shredder | QSb QHF | QAs QPb | QCd QMn | Q Cr Q Hg | QD/F QNi | QHCl |
| | Thermal chip dryer | QSb QHF | QAs QPb | QCd QMn | Q Cr Q Hg | QD/F QNi | QHCl |
| | Scrap dryer/delacquering kiln/decoating kiln | QSb QHF | QAs QPb | QCd QMn | Q Cr Q Hg | QD/F QNi | Q HCl |
| | Dross-only furnace | QSb QHF | QAs QPb | QCd QMn | Q Cr Q Hg | QD/F QNi | QHCl |
| | Rotary dross cooler | QSb QHF | QAs QPb | QCd QMn | Q Cr Q Hg | QD/F QNi | QHCl |
| | Group 2 furnace ("clean furnace") | QSb QHF | QAs QPb | QCd QMn | Q Cr Q Hg | QD/F QNi | Q HCl |

¹ Possible HAP emitted from Secondary Aluminum production facilities include: antimony (Sb) & compounds, arsenic (As) & compounds (inorganic), cadmium (Cd) & compounds, chromium (Cr) & compounds, dioxin/furans (D/F), hydrochloric acid (HCl), hydrogen fluoride (HF), lead (Pb) & compounds, manganese (Mn) & compounds, mercury (Hg) & compounds, and nickel (Ni) & compounds. Area sources are <u>only</u> subject to emission standards for D/F, not the other HAP.

² See applicability flowcharts to determine whether or not your facility is subject to Subpart RRR.





| Secondary Aluminum Processing Unit (consisting one or more group 1 furnaces and in-line fluxers) | QSb QHF | QAs QPb | QCd QMn | Q Cr Q Hg | QD/F QNi | QHCI |
|--|------------|------------|------------|----------------------------|-------------|------|
|--|------------|------------|------------|----------------------------|-------------|------|





Notification of Intent to Conduct a Performance Test

This is a sample notification form that you can use, at your discretion, to comply with 40 CFR 63.1515(a)(6). See http://www.epa.gov/ttn/atw/alum2nd/alum2pg.html for more information about the Secondary Aluminum Production rule.

Applicable Rule: 40 CFR Part 63 Subpart RRR - National Emission Standards for Hazardous Air

Pollutants for Secondary Aluminum Production. Notification of intent to conduct a

performance test is being made in accordance with §63.1515(a)(6).

I. GENERAL INFORMATION

| Print or type the following information for each plant that produces secondary aluminum |
|---|
| (§63.9(b)(2)(i)-(ii)): |
| Owner/Operator |
| Street Address |
| Mailing Address |
| Website (optional) |
| Plant Name |
| Plant Contact/Title |
| Plant Contact Phone Number (optional) |
| Plant Street Address |
| Plant Mailing Address |
| Plant Fax Number (optional) |
| Plant Email Address (optional) |
| Plant 4-digit Standard Industrial Classification (SIC) Code(s) (optional; for help see |
| http://www.osha.gov/ oshstats/sicser.html) |
| Plant UTM coordinates (optional; for help see http://terraserver.homeadvisor.msn.com/) |
| |
| Plant Permit Number (optional) |





| II. | CERTIFICATION | (Note: Yo | ou may edit t | he text in this | section as | deemed | appropriate) |
|-----|---------------|-----------|---------------|-----------------|------------|--------|--------------|
| | | | | | | | |

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify that the information contained in this notification is accurate and true to the best of my knowledge.

| Name of Responsible Official: | | | | | | |
|--------------------------------|------|--|--|--|--|--|
| Title of Responsible Official: | | | | | | |
| | | | | | | |
| | | | | | | |
| Signature | Date | | | | | |

III. TEST INFORMATION

- 1. **Check** the box that applies $(\S63.7(b)(2))$:
 - **G** This is an initial notification of intent to conduct a performance test.
 - My facility previously submitted a notification of intent to conduct a performance test; however, my facility isn't able to conduct the performance test at the previously scheduled time. Describe the circumstances that require you to change your scheduled performance test (optional):_____

2. **Complete** the following table for each affected source and type of control system that will undergo performance testing (§63.7(b)(1); 63.9(f)):

| Source ID (optional) | Emission Point ID (if applicable) (optional) | Type of Control System (optional) | Control System ID (if applicable) (optional) | Type of Test (Initial or periodic) | Date Scheduled (mm/dd/yyyy) |
|----------------------|--|---|--|--|-----------------------------------|
| | | | | | |
| | | | | | |

3. **Have you** prepared a site-specific test plan for conducting the scheduled test that includes a test program summary, the test schedule, data quality objectives, and both an internal and external quality assurance (QA) program (§63.7(c)(2)(i))? [Note: You do not need to submit the plan with this notification unless the Administrator has requested you to do so.] **G** Yes **G** No





- 4. If you have prepared a site-specific test plan, do your **data quality objectives** include your pre-test expectations of the precision, accuracy, and completeness of the data (§63.7(c)(2)(i))? **G** Yes **G** No
- 5. If you have prepared a site-specific test plan, does your **internal QA program** include, at a minimum, the activities planned by routine operators and analysts to provide an assessment of test data precision (such as sampling and analysis of replicate samples) (§63.7(c)(2)(ii))? **G** Yes **G** No
- 6. If you have prepared a site-specific test plan, does your **external QA program** include, at a minimum, plans for test method performance audits (PA) during the performance test? Audit activities include an opportunity for on-site evaluation by the Administrator of instrument calibration, data validation, sample logging, and documentation of quality control data and field maintenance activities (§63.7(c)(2)(iii)).

G Yes **G** No





Notification of Compliance Status Report

This is a sample notification form which you can use to comply with 40 CFR 63.1515(b). See http://www.epa.gov/ttn/atw/alum2nd/alum2pg.html for more information about the rule. You should complete a separate form for each plant at which secondary aluminum production takes place.

<u>Applicable Rule:</u> 40 CFR Part 63 Subpart RRR - National Emission Standards for Hazardous Air

Pollutants for Secondary Aluminum Production. Notification of compliance status is

being made in accordance with §63.1515(b).

I. GENERAL INFORMATION

| Print or type the following information for each plant that produces secondary aluminum: |
|---|
| Owner/Operator |
| Street Address |
| Mailing Address |
| Website (optional) |
| Plant Name |
| Plant Contact/Title |
| Plant Contact Phone Number (optional) |
| Plant Street Address |
| Plant Mailing Address |
| Plant Fax Number (optional) |
| Plant Email Address (optional) |
| Plant 4-digit Standard Industrial Classification (SIC) Code(s) (optional; for help see |
| http://www.osha.gov/ oshstats/sicser.html) |
| Plant UTM coordinates (optional; for help see http://terraserver.homeadvisor.msn.com/) |
| Plant Permit Number (optional) |
| II. COMPLIANCE INFORMATION |
| 1. Submit documentation/analysis supporting your determination of source status |
| (§63.9(h)(2)(i)(E)). My source is a (check one): Gmajor source Garea source |





2. **List** each air pollution control device or method (§63.9(h)(2)(i)(F)):

| Emission Point | Control Device or Method | | HAP(s)* Controlled ¹ | | | Control Efficiency(%) |
|----------------|--------------------------|--------------------|---------------------------------|-------------------|----------------------------|--------------------------|
| | | QSb QD/F QMn | QAs QHCl QHg | QCd QHF QNi | Q Cr Q Pb | |
| | | QSb QD/F QMn | QAs QHCl QHg | QCd QHF QNi | Q Cr Q Pb | |
| | | QSb QD/F QMn | QAs QHCl QHg | QCd QHF QNi | Q Cr Q Pb | |
| | | QSb QD/F QMn | QAs QHCl QHg | QCd QHF QNi | QCr QPb | |
| * | | QSb QD/F QMn | QAs QHCl QHg | QCd QHF QNi | Q Cr Q Pb | |

^{*}HAP = Hazardous Air Pollutant

3. **Submit** a complete copy of your initial performance test report, which should include all dates, associated measurements, and calculations, including visible emissions and opacity tests (§63.1515(b)(1)). **List** the methods used and the results of the initial performance test (§63.9(h)(2)(i)(A),(B),(D)):

| Emission Point | HAP tested | Test Method | Test result | Emission Limit |
|----------------|------------|-------------|-------------|----------------|
| | | | | |
| | | | | |
| | | | | |
| | | | | |

¹ Possible HAP emitted from Secondary Aluminum production facilities include: antimony (Sb) & compounds, arsenic (As) & compounds (inorganic), cadmium (Cd) & compounds, chromium (Cr) & compounds, dioxin/furans (D/F), hydrochloric acid (HCl), hydrogen fluoride (HF), lead (Pb) & compounds, manganese (Mn) & compounds, mercury (Hg) & compounds, and nickel (Ni) & compounds.





4. **List** methods that will be used to determine continuous compliance, along with the established operating range or value for each parameter to be monitored (§63.9(h)(2)(i)(C); §63.1515(b)(4)):

| Emission Point | Parameter | Operating Cycle or Time Period | Continuous Compliance Method | Established Range/Value | |
|----------------|-----------|--------------------------------------|------------------------------------|----------------------------|------------------------|
| | | | | | Grange Gmax Gmin |

| Describe the p | rocedures used | to establish the | e operating pa | arameter (§63.1 | .515(b)(4)): |
|-----------------------|-------------------|------------------|----------------|-----------------|---------------|
| | | | | | |
| | nonitoring and re | | | • | y must comply |
| | | | | | |
| | | | | | |
| | | | | | |

- 5. **Submit** the following information, if applicable:
 - **G** For continuous monitoring systems: approved site-specific test plan and performance test evaluation results (§63.1515(b)(2))





- G For units required to perform unit labeling: verification of unit labeling (§63.1515(b)(3))
- G For capture/collection systems: design information and analysis, with supporting documentation, demonstrating conformance with requirements (§63.1515(b)(5))
- G For bag leak detection systems: analysis and supporting documentation showing conformance with EPA guidance and specifications (§63.1515(b)(6))
- G For afterburners used to control emissions from scrap dyers/delacquering kilns/decoating kilns subject to alternative emission standards: manufacturer's specifications or analysis documenting a design residence time of no less than one (1) second (§63.1515(b)(7))
- G For afterburners used to control emissions from sweat furnaces not subject to performance tests: manufacturer's specifications of analysis documenting a design time of no less than 0.8 seconds² and a design operating temperature of no less than 1600°F (§63.1515(b)(8))
- 7. **Submit** your startup, shutdown, and malfunction (SSM) plan (§63.1515(b)(9)).
- 8. **Submit** your approved operating, maintenance, and monitoring (OM&M) plan (§63.1515(b)(10)).

| I certify that my | (specify affected sources |
|--|---|
| and emission units) is/are in compliance with each ap | oplicable requirement in §63.1500 through |
| §63.1520, the Secondary Aluminum Production NE and complete (§63.9(h)(2)(i)(G)). | SHAP. I certify that this report is true, accurate, |
| Name of Responsible Official: | |
| Title of Responsible Official: | |
| Signature | Date |

² This requirement was changed from 2 seconds to 0.8 seconds in rule amendments proposed on June 14, 2002 (67 FR 41125).





Excess Emissions/Summary Report

This is a sample notification form which you can use to comply with 40 CFR 63.1516(b). See http://www.epa.gov/ttn/atw/alum2nd/alum2pg.html for more information about the rule. You should complete a separate form for each plant at which secondary aluminum production takes place.

<u>Applicable Rule:</u> 40 CFR Part 63 Subpart RRR - National Emission Standards for Hazardous Air

Pollutants for Secondary Aluminum Production. This excess emissions/summary

report is being submitted in accordance with §63.1516(b).

I. GENERAL INFORMATION

| Print or type the following information for each plant that produces secondary aluminum | ı: |
|---|----|
| Owner/Operator | |
| Street Address | |
| Mailing Address | |
| Website (optional) | |
| Plant Name | |
| Plant Contact/Title | |
| Plant Contact Phone Number (optional) | |
| Plant Street Address | |
| Plant Mailing Address | |
| Plant Fax Number (optional) | |
| Plant Email Address (optional) | |
| Plant 4-digit Standard Industrial Classification (SIC) Code(s) (optional; for help see | |
| http://www.osha.gov/ oshstats/sicser.html) | |
| Plant UTM coordinates (optional; for help see http://terraserver.homeadvisor.msn.com/) | |
| Plant Permit Number (optional) | |
| II. EXCESS EMISSIONS AND CMS PERFORMANCE REPORT | |
| A. Excess Emissions | |
| 1. Have any excess emissions or exceedances of a paremeter occurred during this r period (§63.10(e)(3)(v))? G Yes G No [If no, go to section II.B | |





2. If you answered yes, **complete** Table 1 on the following page for each period of excess emissions and/or parameter monitoring exceedances that occurred during startups, shutdowns, and/or malfunctions of your affected source, or during periods other than startups, shutdowns, and/or malfunctions of your affected source (§63.10(c)(7)-(11)).





Table 1. Excess Emissions and Parameter Monitoring Exceedances.

Note: Use a separate line for each period of excess emissions and/or parameter monitoring exceedances of your affected source.

| Nature of Event or Problem Excess Emissions and/or Parameter Monitoring Exceedances Occurred: | | | | | Start Date (mm/dd/yyyy) | Completion Date | Nature and Cause of any | Corrective Action Taken or | |
|---|---------------------------------------|-------------------|--------------------|-----------------------|-----------------------------|--------------------|----------------------------|-------------------------------|--------------------------------|
| Excess Emissions | Parameter Monitoring Exceedance | During Startup | During Shutdown | During Malfunction | During Another Period | | (mm/dd/yyyy) | Malfunction (if known) | Preventive Measures Adopted |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |

Table 2. Continuous Monitoring System Out-of-Control Periods, Repairs, and Adjustments.

<u>Note</u>: Use a separate line for each period of excess emissions and/or parameter monitoring exceedances of your affected source.

| CMS Type | Manufacturer | Process ID Number | Start Date (mm/dd/yyyy) | Completion Date (mm/dd/yyyy) | Nature and Cause of Any Malfunction (if known) | Corrective Action Taken or Preventive Measures Adopted | Nature of the Repairs or Adjustments Made to the CMS that was Inoperative or Out of Control |
|----------|--------------|-------------------------|----------------------------|------------------------------------|--|---|--|
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |





| R | CMC | Performance | |
|----|-----|-------------|---|
| K. | | Performance | ١ |

| В. | CMS Performance | | |
|----|--|---------------------|---|
| 1. | Has a continuous monitoring system (Chigh-level checks), out of control (as dereporting period (§63.10(e)(3)(v))? | efined in §63.8(c)(| 7)(i)), repaired, or adjusted during this |
| 2. | If you answered yes, complete Table 2 of control, repaired, or adjusted (§63. | | 1 |
| 3. | Indicate the total process operating tire days | me during the repo | rting period (§63.10(c)(13): |
| ш. | SUMMARY REPORT - GASEOU CONTINUOUS MONITORING S | | |
| 1. | Indicate the reporting period covered (§63.10(e)(3)(vi)(C),(M)): Reporting period beginning date Reporting period ending date: Summary report date: | :/_ | nd the date of this summary report |
| 2. | Complete the following process descripe each affected source process unit (§ | - | 0 1 1 |
| | Total operating time of affected source during the reporting period (days) | | |
| | Process unit name | | |
| | Process unit description | | |
| | Emissions and/or operating parameter limitations specified in the relevant standard(s) | | |
| | | | |





Monitoring Equipment Information

| Туре | Latest Cetification or Audit Date (mm/dd/yyyy) | Manufacturer | Model | HAPs Monitored |
|------|---|--------------|-------|----------------|
| | | | | |
| | | | | |
| | | | | |

3. **Complete** the following emission data summary table for each affected source (\$63.10(e)(3)(vi)(I)):

| Total duration of excess emissions/parameter exceedances - opacity (min.) | | |
|---|------|--|
| Total duration of excess emissions/parameter exceedances - gases (hours) | | |
| Total operating time of affected source during the reporting periods (days) | | |
| Percent of total source operating time during which excess emissions/ parameter exceedances occurred (percent) | | |
| Summary of causes of excess emissions/parameter exceedances (percent of total duration by cause) | | |
| Startup/shutdown | % | |
| Control equipment problems | % | |
| Process problems | % | |
| Other known causes | % | |
| Other unknown causes | % | |
| TOTAL | 100% | |





4. **Complete** the following CMS performance summary table for each affected source (§63.10(e)(3)(vi)(J)):

| Total duration of CMS downtime - opacity (min.) | | |
|---|------|--|
| Total duration of CMS downtime - gases (hours) | | |
| Total operating time of affected source during the reporting periods (days) | | |
| Percent of total source operating time during which CMS were down (percent) | | |
| Summary of causes of CMS downtime (percent of downtime by cause) | | |
| Monitoring equipment malfunctions | % | |
| Nonmonitoring equipment malfunctions | % | |
| Quality assurance/quality control calibrations | % | |
| Other known causes | % | |
| Other unknown causes | % | |
| TOTAL | 100% | |

| 5. | Have you made any cha | anges in CMS, processes, | or controls since the last | reporting period |
|----|------------------------|--------------------------|----------------------------|------------------|
| | (§63.10(e)(3)(vi)(K))? | G Yes G No | | |

| If you answered yes, please describe the changes:_ | |
|--|--|
| | |
| | |

IV. CERTIFICATIONS (Only include those certifications which apply to your facility)

Only unpainted aluminum chips were used as feedstock in any thermal chip dryer during this reporting period.

Only dross was used as the charge material in any dross-only furnace during this reporting period.

Each furnace was operated such that the level of molten metal remained above the top of the passage between the sidewell and hearth during reactive fluxing, and reactive flux, except for





cover flux, was added only to the sidewell or to a furnace hearth equipped with an add-on air pollution control device for PM, HCl, and D/F emissions during this reporting period.

Each group 1 furance without add-on air pollution control devices subject to emission limits in §63.1505(i)(2) processed only clean charge during this reporting period.

Only clean charge materials were processed in any group 2 furnace during this reporting period, and no fluxing was performed or all fluxing performed was conducted using only nonreactive, non-HAP-containing/non-HAP-generating fluxing gases or agents, except for cover fluxes, during this reporting period.

Only nonreactive, non-HAP-containing, non-HAP-generating flux gases, agents, or materials were used at any time during this reporting period.

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify that the information contained in this notification is accurate and true to the best of my knowledge. (You may edit the text in this certification as deemed appropriate)

| Name of Responsible Official: | |
|-------------------------------|------|
| | |
| Signature | Date |

V. ATTACHMENTS

Submit with this report the results of any performance test conducted during the reporting period, including one complete report documenting test methods and procedures, process operation, and monitoring parameter ranges or values for each test method used for a particular type of emission point tested.





Annual Compliance Certification

This is a sample annual compliance certification that can be used to comply with 40 CFR 63.1516(c). See http://www.epa.gov/ttn/atw/alum2nd/alum2pg.html for more information. You should complete separate forms for each plant at which secondary aluminum production occurs.

Applicable Rule: 40 CFR Part 63 Subpart RRR - National Emission Standards for Hazardous Air

Pollutants for Secondary Aluminum Production. Annual compliance certification is

being made in accordance with §63.1516(c).

I. GENERAL INFORMATION

| Print or type the following information for each plant that produces secondary aluminum: |
|---|
| Owner/Operator |
| Street Address_ |
| Mailing Address |
| Website (optional) |
| Plant Name |
| Plant Contact/Title |
| Plant Contact Phone Number (optional) |
| Plant Street Address |
| Plant Mailing Address |
| Plant Fax Number (optional) |
| Plant Email Address (optional) |
| Plant 4-digit Standard Industrial Classification (SIC) Code(s) (optional; for help see |
| http://www.osha.gov/ oshstats/sicser.html) |
| Plant UTM coordinates (optional; for help see http://terraserver.homeadvisor.msn.com/) |
| Plant Permit Number (optional) |





| II. | CERTIFICATION (Note: You may | e edit the text in this section as deemed appropriate. |
|-------------|--|--|
| year | • • • | s defined in §63.1516(b)(1), that occurred during the t 63 Subpart RRR and that all monitoring, reporting, ing the year. |
| and §63. | 1520, the Secondary Aluminum Production of a written description of your non-company | (specify affected sources each applicable requirement in §63.1500 through on NESHAP. For operations that are not in compliance pliant operations, including any corrective actions being |
| | Name of Responsible Official: Title of Responsible Official: | |
| | Signature | Date |



Appendix D



Appendix D – Sweat Furnace Requirements from the Secondary Aluminum Production Rule

| | Requirement(s) | 40CFR Section | Deadline/Frequency |
|---------------------------------|---|---|---|
| Emission Standards | • 0.80 ng D/F TEQ per dscm (3.5 x $10^{\text{-}10}~\text{gr/dscf})$ @ $11\%~\text{O}_2$ | §63.1505(f) | Existing sources: 3/24/03 New sources: 3/23/00 or upon startup, whichever is later |
| Operating Require- ments | Operate in accordance w/OM&M plan If equipped w/add-on APCD: design & install emission capture & collection system in accordance w/<u>Industrial Ventilation</u>: A <u>Manual of Recommended Practice</u>; vent captured emissions through a closed system, except that dilution air may be added to control temperature at fabric filter inlet If equipped w/afterburner: Maintain average afterburner operating temperature for each 3-hour period at or above average operating temperature established during performance test or 1600°F if a performance test was not conducted & afterburner has design residence time of 0.8 seconds or greater & operating temperature of 1600°F or greater | §63.1506(c), (h) | Compliance date |
| Testing Require- ments | Submit notification of intent to conduct performance test Submit site-specific test plan Conduct performance test to measure D/F emissions at control device outlet; no performance test is required if afterburner has design residence time of 0.8 seconds or greater & operating temperature of 1600°F or greater If equipped w/afterburner: conduct performance evaluation of temperature monitoring device, measure & record average afterburner temperature for each 15-minute period during performance test Establish operating parameter values | • 63.1515(a)(6) • 63.7(c)(2) • 63.1512(f); 63.1511(b); 63.1511(e) • 63.1512(m) | 60 days before test Existing sources: by compl. date; New sources: by 90 days after compliance date; Major sources: every 5 years thereafter During performance test |
| Monitoring Require- ments | If equipped w/add-on APCD: annually inspect all emission capture, collection, & transport systems to ensure that systems continue to operate in accordance w/standards If equipped w/afterburner: monitor avg. temperature for each 15-minute block; determine 3-hr block averages; conduct annual inspection | \$63.1510(d),(g) | Compliance date |



Appendix D



| | Requirement(s) | 40CFR Section | Deadline/Frequency |
|-----------------------|--|--------------------------------------|--|
| Reporting Require- | Initial notification | • 63.9(b)(2) | • 120 days after eff. date or startup |
| ments | Notification of anticipated date of perf. test | • 63.1515(a)(6) | • 60 days before perf. test |
| | Site-specific test plan | • 63.7(c)(2)(iv) | • 60 days before perf. test |
| | • OM&M plan | • 63.1510(b) | • Existing sources: by compliance date; New sources: by 90 days after performance test (or 90 days after compliance date if no |
| | | | test required) |
| | Notification of compliance status report | • 63.1515(b) | • Existing sources: 60 days after compliance date; New sources: by 90 days after performance test (or 90 days after compliance date if no test required) |
| | • Excess emissions reports | • 63.1516(b) | • Semi-annually, 60 days after cal. half |
| | Annual compliance certification/summary report | • 63.1516(b),(c) | • Annually, with one of excess emissions reports |
| | • SSM reports | • 63.10(d)(5)(i) | 30 days after calendar half when a SSM occurred |
| | Report of actions inconsistent w/SSM plan | • 63.6(e)(3)(iv); 63.10(d)(5)(ii) | • 2 working days after event (phone report) & 7 working days after event (letter report) |



Appendix D



| | Requirement(s) | 40CFR Section | Deadline/Frequency |
|---------------------------------------|---|---|---|
| Recordkeepi ng Requiremen ts | For afterburner: records of 15-minute average operating temperature, including any period when average temperature in any 3-hr block period falls below compliant operating parameter value with a brief explanation of cause & corrective action taken; records of annual inspection For capture/collection systems: records of annual inspection Copies of all notifications & reports & their supporting documentation Records of occurrence & duration of each SSM or malfunction of operation of process & control equipment Records of actions inconsistent w/SSM plan & actions consistent w/SSM plan Records of measurements needed to demonstrate compliance Records of any approved alternative monitoring or test procedure SSM plan OM&M plan | • 63.1517(b)(2) • 63.1517(b)(14) • 63.1517(a) • 63.1516(a) • 63.10(b)(2)(vii) • 63.10(b)(2)(viii) • 63.1517(b)(15) • 63.1517(b)(16) • 63.1517(b)(16) | Keep records for at least 5 years, may keep off-site after first 2 years; records must be accessible within 24 hours of request |